

Mr. John Peat
Rinker Boat Company, Inc.
300 West Chicago Street
Syracuse, Indiana 46567

Re: 085-13683
Significant Source Modification to:
Part 70 permit No.: T085-7516-00031

Dear Mr. Peat:

Rinker Boat Company, Inc. was issued Part 70 operating permit T085-7516-00031 on June 3, 1999 for a stationary fiberglass boat building and repairing operation. An application to modify the source was received on December 29, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (b) one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour.

The following insignificant activities are also being added to the source:

- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building;
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including space heaters for comfort heating including:
 - (1) one (1) natural gas-fired space heater with a maximum heat input capacity of 4.4 million (MM) British thermal units (Btu) per hour located in the Plant 3 expansion; and
 - (2) one (1) natural gas-fired space heater with a maximum heat input capacity of 5.25 million (MM) British thermal units (Btu) per hour located in the Plant 3 expansion.

- (c) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius), including the use of various mold release waxes as well as polishing and sealing waxes used in the finishing process.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Trish Earls at (973) 575-2555, ext. 3219 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
TE/EVP

Rinker Boat Company, Inc.
Syracuse, Indiana
Permit Reviewer: TE/EVP

Page 3 of 3
Source Modification No. 085-13683-00031

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Rinker Boat Company, Inc.
300 West Chicago Street
Syracuse, Indiana 46567**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7516-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 3, 1999
1st Administrative Amendment 085-11115-00031	
Pages Amended: 28-29, 39	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 6, 1999
First Significant Source Modification No.: 085-13683-00031	
Pages Amended: 2 - 6, 28 - 31h, 33a, 39, 39a	
Issued by: Original signed by Janet McCabe Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 15, 2001

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass boat building and repairing operation.

Responsible Official: Mr. Kim Slocum
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
SIC Code: 3732
County Location: Kosciusko
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) fiberglass layup operation (ID No. P2-3), constructed in 1993, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4);
- (2) one (1) fiberglass layup operation (ID No. P3-2), constructed in 1989, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (3) one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (4) one (1) upholstery glue application area (ID No. P1-1), constructed in 1993, located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (5) one (1) assembly glue application area (ID No. P2-1), constructed in 1993, located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;
- (6) one (1) assembly glue application area (ID No. P3-1), constructed in 1989, located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (7) one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour;

- (8) one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4); and
- (9) one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of two (2) routers, three (3) table saws, three (3) chop saws, one (1) panel saw, and one (1) belt sander, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Other categories with emissions below significant thresholds:
 - (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) one (1) fiberglass layup operation (ID No. P2-3), constructed in 1993, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4);
- (2) one (1) fiberglass layup operation (ID No. P3-2), constructed in 1989, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (3) one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (4) one (1) upholstery glue application area (ID No. P1-1), constructed in 1993, located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (5) one (1) assembly glue application area (ID No. P2-1), constructed in 1993, located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;
- (6) one (1) assembly glue application area (ID No. P3-1), constructed in 1989, located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (7) one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour; and
- (8) one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Total VOC usage in each of the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall be limited to less than 25.0 tons per 12 consecutive month period, rolled on a monthly basis. This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the assembly glue application area and the flotation foam blowing operation. Compliance with this limit makes 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable.
- (b) Pursuant to CP-085-2400-00031, issued January 29, 1993, the Best Available Control Technology (BACT) for the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) is to comply with the following work practice: solvent used to clean up chopper guns and other tools shall be discharged into containers, and these containers shall be kept covered at all times other than when solvent is discharged into them.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Compliance with 326 IAC 2-4.1-1 (MACT) has been determined to be sufficient as BACT. Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the VOC emissions from the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be limited to less than 100 tons per 12 consecutive month period.

D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.4 Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25-3]

- (a) Pursuant to 326 IAC 20-25-3(a), except as provided in 326 IAC 20-25-3 (e), (f), and (h), the Permittee shall comply with the provisions of 326 IAC 20-25-3 on or before January 1, 2002. The total HAP monomer content of the following materials used in the two (2) fiberglass layup operations (ID P2-3 and P3-2) shall be limited depending on the application method and products produced as specified below. Since this source manufactures reinforced plastic composite watercraft, the following limits shall apply to the two (2) fiberglass layup operations (ID P2-3 and P3-2):

TABLE II Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

*Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).

- (b) Pursuant to 326 IAC 20-25-3(b), except as provided in 326 IAC 20-25-3(f), the following categories of materials in 326 IAC 20-25-3(a) shall be applied using mechanical nonatomized application technology or manual application:
 - (1) Production noncorrosion resistant, unfilled resins from all sources.
 - (2) Production, specialty product resins from all sources.
 - (3) Tooling resins used in the manufacture of watercraft.
 - (4) Production resin used for Class I flame and smoke products.
- (c) Pursuant to 326 IAC 20-25-3(c), unless specified in 326 IAC 20-25-3(b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
 - (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure.

- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Pursuant to 326 IAC 20-25-3(d), cleaning operations for resin and gel coat application equipment are as follows:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of 326 IAC 20-25-3(d).
- (e) Pursuant to 326 IAC 20-25-3(g), the Permittee may comply with this section using monthly emission averaging within each resin or gel coat application category listed in 326 IAC 20-25-3(a) without prior approval by the commissioner.
- (f) Pursuant to 326 IAC 20-25-3(h), upon written application by the source, the commissioner may approve the following:
 - (1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in 326 IAC 20-25-3(a) through (d).
 - (2) Use of monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3(a) if the following conditions are met:
 - (A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3(a) through (c).
 - (B) The source uses any one (1) or a combination of the following emission reduction techniques:
 - (i) Resins or gel coats with HAP monomer contents lower than specified in 326 IAC 20-25-3(a).
 - (ii) Vapor suppressed resins.
 - (iii) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
 - (iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
 - (v) Controlled spray used in combination with automated actuators or robots.
 - (vi) Controlled spray that includes the following:
 - (AA) Mold flanges.
 - (BB) Spray technique.
 - (CC) Spray gun pressure.
 - (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.
 - (vii) Emission reduction techniques approved under 326 IAC 20-25-3(h)(1).

Sources using averaging shall not use spray equipment that produces higher emissions than the equipment specified in 326 IAC 20-25-3(c)(2) through (c)(5).

- (g) Pursuant to 326 IAC 20-25-3(i), to determine emission estimates, the following references or methods shall be used:
- (1) "Unified Emission Factors for Open Molding of Composites", April 1999*, except use of controlled spray emission factors must be approved by the commissioner.
 - (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and supplements, January 1995*, except for hand layup and spray layup operations emission factors.
 - (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

D.1.5 Work Practice Standards [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, on or before March 1, 2001, the Permittee shall operate the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) in accordance with the following work practice standards:

- (a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in 326 IAC 20-25-4(7), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.6 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Use of resins, gel coats and clean-up solvents, and other material containing volatile organic compounds (VOC), shall be limited such that the potential to emit (PTE) VOC shall be less than 247.0 tons per 365 consecutive day period, rolled on a daily basis. Compliance with this limit shall be determined based upon the following criteria:

- (a) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. These models are now referred to as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (c) VOC emissions from each of the other operations shall be based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used.

This limitation, in conjunction with the potential to emit VOCs of 3.0 tons per year from insignificant activities, will prevent the VOC emissions from being greater than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.7 Stack Height

Pursuant to CP-085-2400-00031, issued January 29, 1993, the following shall apply:

- (a) The four (4) stacks exhausting from Plant 2 (ID Nos. S2-1, S2-2, S2-3, and S2-4) shall have a diameter of 2 feet and a minimum stack height of 25 feet above ground level and shall be located on the west side of Plant 2. All exhaust from the fiberglass layup operation (ID No. P2-3) shall be exhausted through these four (4) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.
- (b) The two (2) stacks exhausting from Plant 3 (ID Nos. S3/3X-1 and S3/3X-2) shall have a diameter of 2 feet and a minimum stack height of 39 feet above ground level and shall be located on the west side of Plant 3. All exhaust from the fiberglass layup operation (ID No. P3-2) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

D.1.8 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM overspray from the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2), the upholstery glue application area (ID No. P1-1), and the three (3) assembly glue application areas (ID Nos. P2-1, P3-1, and P3X-1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1, D.1.2, and D.1.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.12 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)

Compliance with the monomer content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to Condition D.1.3(a) and D.1.3(b).

D.1.13 Hazardous Air Pollutants (HAPs) [326 IAC 20-25-5]

Pursuant to 326 IAC 20-25-5(c), compliance with the HAP monomer content and usage limitations specified in condition D.1.4 shall be determined using one (1) of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (3) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with condition D.1.4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.14 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2) are in operation.

D.1.15 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass layup booth stacks (S2-1, S2-2, S2-3, S2-4, S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6, and S3/3X-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.6.
 - (1) For Plants 2, 3, and the Plant 3 expansion the following records shall be maintained:
 - (i) A log of the number of boats produced in Plants 2 and 3 and the number of boat feet produced in the Plant 3 expansion on a daily basis;
 - (ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (iii) The cleanup solvent usage for each month;
 - (iv) The total VOC usage for each month; and
 - (v) The weight of VOCs emitted for each compliance period.
 - (2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), the amount and VOC content of each material and solvent used shall be recorded on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established in Conditions D.1.2 and D.1.3.
 - (1) The usage by weight and monomer content of resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
 - (5) The calculated total VOC emitted from resin and gel coat usage for each month and for the compliance period.
- (c) To document compliance with Conditions D.1.14 and D.1.15, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Record Keeping Requirements [326 IAC 20-25-6]

- (a) Pursuant to 326 IAC 20-25-6(a), on and after January 1, 2002, the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 326 IAC 20-25. Examples of such records are as follows:
 - (1) Purchase orders.
 - (2) Invoices.
 - (3) Material safety data sheets (MSDS).
 - (4) Manufacturer's certified product data sheets.
 - (5) Calculations.
 - (6) Other records to confirm compliance.
- (b) Pursuant to 326 IAC 20-25-6(b), the Permittee shall maintain records of all information, including all reports and notifications required by 326 IAC 20-25. Such records shall be recorded in a form suitable and readily available for inspection and review. Except as provided in 326 IAC 20-25-8(d), the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.19 Reporting Requirements [326 IAC 20-25-7]

- (a) Pursuant to 326 IAC 20-25-7(a), on or before June 1, 2001, the owner or operator of a source subject to this rule shall submit an initial notification report to the commissioner. The notification report shall include all of the following:
- (1) Name and address of the owner or operator.
 - (2) Address of the physical location of the source.
 - (3) Statement verifying that the source is subject to the rule signed by a responsible official as set forth in 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to this rule shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:
- (1) Name and address of the owner or operator.
 - (2) Address of the physical location.
 - (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.
- (c) Pursuant to 326 IAC 20-25-7(c), sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) shall submit a quarterly summary report and supporting calculations.

D.1.20 Operator Training [326 IAC 20-25-8]

- (a) Pursuant to 326 IAC 20-25-8(a), the Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) according to the following schedule:
- (1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.
 - (3) To ensure training goals listed in 326 IAC 20-25-8(b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) above if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (b) Pursuant to 326 IAC 20-25-8(b), the lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) Pursuant to 326 IAC 20-25-8(c), the Permittee shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.
- (d) Pursuant to 326 IAC 20-25-8(d), records of prior training programs and former personnel are not required to be maintained.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) Other categories with emissions below significant thresholds:
- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Trim-off operation shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.
 Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
 Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
 Part 70 Permit No.: T085-7516-00031
 Facility: the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2), the three (3) glue application areas (ID Nos. P1-1, P2-1 and P3-1), and the foam blowing operation (ID No. P2-2)
 Parameter: VOC emissions
 Limit: Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators in each of the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2), the upholstery glue application area (ID No. P1-1), the two (2) assembly glue application areas (ID Nos. P2-1 and P3-1), and the foam blowing operation (ID No. P2-2) shall be limited such that the potential to emit (PTE) VOC from these operations shall be limited to less than 247.0 tons per 365 consecutive day period, rolled on a daily basis, for a source wide VOC emission limit of less than 250.0 tons per 365 consecutive day period.

Month: _____ Year: _____

Day	VOC Emissions This Day (tons)	VOC Emissions Last 365 Day Period (tons)	Day	VOC Emissions This Day (tons)	VOC Emissions Last 365 Day Period (tons)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			Total		

9 No deviation occurred in this month.
 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rinker Boat Company, Inc.
 Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
 Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
 Source Modification No.: SSM085-13683-00031
 Facility: one (1) fiberglass layup operation (ID No. P3X-2)
 Parameter: volatile organic compounds (VOC) and volatile organic hazardous air pollutants (HAPs)
 Limit: (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the potential to emit (PTE) VOC from resin and gel coat applications shall be limited to less than 100 tons per twelve (12) consecutive month period.
 (b) Use of resins and gel coats shall be limited such that the total potential to emit (PTE) volatile organic hazardous air pollutant (HAP) from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC/HAP Emitted This Month (tons)	VOC/HAP Emitted Previous 11 Months (tons)	12 Month Total VOC/HAP Emitted (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Significant Source Modification

Source Name:	Rinker Boat Company, Inc.
Source Location:	300 West Chicago Street, Syracuse, Indiana 46567
County:	Kosciusko
Source Modification No.:	085-13683-00031
SIC Code:	3732
Permit Reviewer:	Trish Earls/EVP

On March 28, 2001, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Rinker Boat Company, Inc. had applied for a Significant Source Modification to construct a new fiberglass layup operation including a new gel coat booth and an additional adhesive application operation which will be housed in a new manufacturing area. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 17, 2001, Ron Ward of Cornerstone Environmental Health and Safety submitted comments on behalf of Rinker Boat Company, Inc. on the proposed permit. The summary of the comments and responses is as follows:

Comment #1

Section A.2, Emission Units and Pollution Control Equipment Summary, item (1)

The original Title V Operating Permit issued in June of 1999 identified two stacks S2-1 and S2-2. Since that time the stacks have been upgraded and two additional stacks have been added to Plant #2 that should be designated S2-3 and S2-4. Please ignore the V4-A, V4-B, V4-1 and V4-2 designations in the SSM application. A revised facility drawing is being submitted for clarification.

Response #1

Item (1) under section A.2 has been revised to show the correct stack information as follows:

- (1) one (1) fiberglass layup operation (ID No. P2-3), constructed in 1993, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through ~~two (2)~~ **four (4)** stacks (ID Nos. S2-1, ~~and~~ S2-2, **S2-3, and S2-4**);

Comment #2

Section A.2, Emission Units and Pollution Control Equipment Summary, item (2)

Stacks S3-1 and S3-2 have been upgraded and additional stacks were added for a total of seven stacks which draw air emissions from both Plant #3 and Plant #3X. These seven (7) stacks are designated S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7. Ignore the V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9 designations in the SSM application.

Response #2

Item (2) under section A.2 has been revised to show the correct stack information as follows:

- (2) one (1) fiberglass layup operation (ID No. P3-2), constructed in 1989, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through ~~two (2)~~ **seven (7)** stacks (ID Nos. ~~S3-1 and S3-2~~ **S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7**);

Comment #3

Section A.2, Emission Units and Pollution Control Equipment Summary, item (3)

Ignore the V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9 designations in the application and replace them with the seven (7) stack designations S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7. These seven stacks draw air emissions from both Plant #3 and Plant #3X.

Also, the new fiberglass layup operation has dry filters for particulate matter overspray control. This should be added to the equipment description.

Response #3

Item (3) under section A.2 has been revised to show the correct stack information and to include dry filters as particulate matter overspray control as follows:

- (3) one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, **with dry filters for particulate matter overspray control**, and exhausting through seven (7) stacks (ID Nos. ~~V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9~~ **S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7**);

The emission calculation spreadsheet for the new fiberglass layup operation and the emission calculation summary spreadsheet (Appendix A, pages 1 and 2) have been revised to include a 90% particulate matter control efficiency for the dry filters.

Comment #4

Section A.2, Emission Units and Pollution Control Equipment Summary, item (8)

The original Title V Operating Permit issued in June of 1999 identified the two stacks S2-1 and S2-2. Since that time the stacks have been upgraded and two additional stacks have been added to Plant #2 designated as S2-3 and S2-4. Please ignore the V4-A, V4-B, V4-1 and V4-2 designations in SSM application.

Furthermore, the foam injection process involves a two component mixing system with mixing taking place in a mixing head that is inserted into the boat cavity. There is no spraying involved in the process, thus no overspray issue that would need to be controlled with dry filters. Accordingly this control description should be removed.

Response #4

Item (8) under section A.2 has been revised to show the correct stack and control device information as follows:

- (8) one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, ~~with dry filters for particulate matter overspray control~~, and exhausting through ~~two (2)~~ **four (4)** stacks (ID Nos. S2-1, ~~and S2-2~~, **S2-3, and S2-4**); and

Comment #5

The source requested that the corrections to the stack information and equipment descriptions listed in comments #1 through #4 also be made to the equipment descriptions in section D.1. The facility description box in section D.1 is revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

- | | |
|-----|---|
| (1) | one (1) fiberglass layup operation (ID No. P2-3), constructed in 1993, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) four (4) stacks (ID Nos. S2-1, and S2-2 , S2-3, and S2-4); |
| (2) | one (1) fiberglass layup operation (ID No. P3-2), constructed in 1989, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) seven (7) stacks (ID Nos. S3-1 and S3-2 S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7); |
| (3) | one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control , and exhausting through seven (7) stacks (ID Nos. V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9 S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7); |
| (4) | one (1) upholstery glue application area (ID No. P1-1), constructed in 1993, located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour; |
| (5) | one (1) assembly glue application area (ID No. P2-1), constructed in 1993, located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour; |
| (6) | one (1) assembly glue application area (ID No. P3-1), constructed in 1989, located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour; |
| (7) | one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour; and |
| (8) | one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control , and exhausting through two (2) four (4) stacks (ID Nos. S2-1, and S2-2 , S2-3, and S2-4). |

Also, the Stack Summary section of the TSD should be updated to reflect the revised stack information. The new stacks added to Plant 2 should also be added to the table. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The revised Stack Summary section of the TSD is as follows:

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
V4-3 S3/3X-1*	P3-2 and P3X-2	3039	32.5	4265	ambient
V4-4 S3/3X-2*	P3-2 and P3X-2	3039	32.5	4265	ambient
V4-5 S3/3X-3*	P3-2 and P3X-2	3031	32.5	4265	ambient
V4-6 S3/3X-4*	P3-2 and P3X-2	3031	32.5	4265	ambient
V4-7 S3/3X-5**	P3-2 and P3X-2	3031	32.5	4265	ambient
V4-8 S3/3X-6**	P3-2 and P3X-2	3031	32.5	4265	ambient
V4-9 S3/3X-7*	P3-2 and P3X-2	3031	32.5	4265	ambient
S2-3	P2-3 and P2-2	25	2.5	4265	ambient
S2-4	P2-3 and P2-2	25	2.5	4265	ambient

* These vents are existing roof vents that are being modified to capture emissions from P3-2 (existing) and P3X-2 (expansion) **Stacks S3-1 and S3-2 have been upgraded and additional stacks were added for a total of seven stacks which draw air emissions from both Plant #3 and Plant #3X.**

** These vents were wall vents that will be modified into roof vents that will exhaust emissions from the existing gel coat booths in Plant 3 and the new Plant 3X lamination operation emissions.

Comment #6

Condition D.1.1, Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The phrase "rolled on a monthly basis" should be removed per our current understanding of IDEM's position on this compliance issue.

Response #6

This language is consistent with IDEM's position on annual limits. This language allows the source to have periods of high and low monthly VOC usage while still complying with the annual limit. Therefore, this language will remain unchanged in the Part 70 permit.

Comment #7

Condition D.1.4, PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21], first paragraph

The VOC limit as expressed in the first paragraph should be changed to "the entire source shall be limited to less than 250 tons of VOC emissions per consecutive twelve month period."

Condition D.1.4, PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21], paragraph (b)

We suggest inserting the current use of the "Unified Emission Factors for Open Molding of Composites" emission factor table for calculating emissions.

Condition D.1.4, PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21], last paragraph

The VOC emission limit as expressed in the last paragraph should be changed to "250 tons per year" per precedent established by recently issued IDEM permits.

Response #7

In order to change the PSD minor VOC limit to one source-wide limit of less than 250 tons per year, the record keeping and reporting requirements currently applicable to only the three fiberglass layup operations, the four glue application areas, and the foam blowing operation would also apply to the insignificant activities (specifically the natural gas combustion units and mold release agent usage). Allowing the insignificant activities to emit their potential VOC emissions of 3.0 tons per year and limiting the significant emission units to 246.0 tons per year would not require record keeping or reporting for the insignificant activities. Therefore, the emission limit will remain as is, however, the emission limit for the significant emission units is incorrectly expressed as being less than 246.0 tons per year, which would result in a source-wide VOC limit of less than 249.0 tons per year. Since the major source threshold for 326 IAC 2-2 (PSD) is 250 tons per year, the correct source-wide PSD minor VOC limit is a limit of less than 250 tons per year. Therefore, the limit on the significant emission units will be changed from less than 246.0 tons per year to less than 247.0 tons per year.

In June, 1998, IDEM approved the use of new emission factors published by the Composites Fabricators Association (CFA) in a report entitled "CFA Emission Models for the Reinforced Plastics Industries," dated February 28, 1998. These models are now referred to as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). Therefore, the reference to the original report published by the CFA will not be removed, however, a sentence will be added to include reference to the "Unified Emission Factors for Open Molding of Composites", which is where the specific emission factors were obtained.

Condition D.1.4 is now revised to read as follows:

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Use of resins, gel coats and clean-up solvents, and other material containing volatile organic compounds (VOC), shall be limited such that the potential to emit (PTE) VOC shall be less than ~~246.0~~ **247.0** tons per 365 consecutive day period, rolled on a daily basis. Compliance with this limit shall be determined based upon the following criteria:

- (a) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. **These models are now referred to as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999).** For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (c) VOC emissions from each of the other operations shall be based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used.

This limitation, in conjunction with the potential to emit VOCs of 3.0 tons per year from insignificant activities, will prevent the VOC emissions from being greater than ~~249~~ **250** tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

A revised quarterly report form for the PSD minor limit including the new fiberglass layup operation and the revised limit was erroneously not included in the draft Significant Source Modification. Therefore, the quarterly report form for the PSD minor VOC limit is now revised to show the revised VOC limit and to include the new fiberglass layup operation.

Comment #8

Condition D.1.5, Stack Height, paragraphs (a) and (b)

Paragraph (a) should be changed to reflect the current stack configuration for Plant #2. The four stacks identified as S2-1, S2-2, S2-3 and S2-4 are 25 feet in height and 36 inches in diameter. Air flow rate is 4,265 ACFM.

Paragraph (b) should be changed to reflect the upgrade of the two stacks previously identified as S3-1 and S3-2. These two stacks now correspond with stacks S3/3X-1 and S3/3X-2. The two stacks now identified as S3/3X-1 and S3/3X-2 are 39 feet in height and 30 inches in diameter. Air flow rate is 4,265 ACFM.

Response #8

Paragraph (a) has been revised such that all four (4) stacks for the fiberglass layup operation in Plant 2 are included in the condition. Paragraph (b) has been revised to include the new stack designations for the two stacks previously identified as S3-1 and S3-2.

Condition D.1.5 is revised to read as follows:

D.1.5 Stack Height

Pursuant to CP-085-2400-00031, issued January 29, 1993, the following shall apply:

- (a) The ~~two (2)~~ **four (4)** stacks exhausting from Plant 2 (ID Nos. S2-1, ~~and S2-2,~~ **S2-3, and S2-4**) shall have a diameter of 2 feet and a minimum stack height of 25 feet above ground level and shall be located on the west side of Plant 2. All exhaust from the fiberglass layup operation (ID No. P2-3) shall be exhausted through these ~~two (2)~~ **four (4)** stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.
- (b) The two (2) stacks exhausting from Plant 3 (ID Nos. S3/~~3X~~-1 and S3/~~3X~~-2) shall have a diameter of 2 feet and a minimum stack height of 39 feet above ground level and shall be located on the west side of Plant 3. All exhaust from the fiberglass layup operation (ID No. P3-2) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

Comment #9

Conditions D.1.11, Particulate Matter (PM) and D.1.12, Monitoring

Should the new fiberglass layup operation in the Plant 3 expansion be included in these conditions?

Response #9

Since the new fiberglass layup operation also has dry filters it should be included in condition D.1.11. Also, the new stack configuration for the fiberglass layup operations in Plant 3 and the Plant 3 expansion has been incorporated into condition D.1.12. Conditions D.1.11 and D.1.12 are revised to read as follows:

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ~~two (2)~~ **three (3)** fiberglass layup operations (ID Nos. P2-3, ~~and~~ P3-2, **and P3X-2**) are in operation.

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass layup booth stacks (S2-1, S2-2, **S2-3, S2-4, S3/3X-1, and S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6, and S3/3X-7**) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment #10

Condition D.1.13, Record Keeping Requirements, paragraph (b)

[Should the first sentence of paragraph \(b\) also include D.1.4 since this is a source wide PSD Minor limit?](#)

Response #10

Paragraph (b) of condition D.1.13 only includes record keeping requirements for the new fiberglass layup operation (P3X-2) to document compliance with the BACT and MACT requirements of conditions D.1.2 and D.1.3. Therefore, it should not include reference to condition D.1.4. However, since the limit in condition D.1.4 also includes the new fiberglass layup operation in the plant 3 expansion, part (a)(1)(i) of condition D.1.13 will be revised to include records of the number of boat feet produced in the Plant 3 expansion on a daily basis since emissions for the new fiberglass layup operation (P3X-2) were based on the boat feet produced.

Condition D.1.13, paragraph (a)(1) is revised to read as follows:

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.4.
 - (1) For Plants 2, ~~and~~ 3, **and the Plant 3 expansion** the following records shall be maintained:
 - (i) A log of the number of boats produced in Plants 2 and 3 **and the number of boat feet produced in the Plant 3 expansion** on a daily basis;

- (ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (iii) The cleanup solvent usage for each month;
- (iv) The total VOC usage for each month; and
- (v) The weight of VOCs emitted for each compliance period.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Effective March, 2001, a new rule was added to the Indiana Administrative Code. This rule, 326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units), applies to owners or operators of sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, and that meet all of the following criteria:
 - (1) Manufacture reinforced plastics composites parts, products, or watercraft.
 - (2) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.
 - (3) Have actual emissions of styrene equal to or greater than three (3) tons per year.

Since this source has the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, manufactures reinforced plastics composites watercraft, have emission units where resins and gel coats that contain styrene are applied and cured using the open molding process, and have actual emissions of styrene of greater than 3 tons per year, it is subject to this rule.

Pursuant to 326 IAC 20-25-3(e), a source that was issued a permit pursuant to 326 IAC 2 on or after June 28, 1998, but prior to the effective date of this rule, and that obtained a revised best available control technology (BACT) determination in the permit for emission units, is not subject to this section until the permit is renewed, or the emission unit undergoes a modification that increases the potential to emit styrene. Although the source was issued a Title V operating permit on June 3, 1999 which contained a BACT determination for the existing fiberglass layup operations (ID Nos. P2-3 and P3-2), it was a BACT determination that was carried over from a previous construction permit issued to the source. The BACT determination was not revised, therefore, the existing fiberglass layup operations are subject to this rule and must comply with the applicable requirements of the rule no later than January 1, 2002.

A paragraph discussing the applicability of this rule and containing the applicable requirements of this rule is added to the Technical Support Document. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The paragraph discussing the applicability of 326 IAC 20-25 reads as follows:

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)
This rule applies to owners or operators of sources that emit or have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, and that meet all of the following criteria:

- (1) Manufacture reinforced plastics composites parts, products, or watercraft.
- (2) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.
- (3) Have actual emissions of styrene equal to or greater than three (3) tons per year.

Since this source has the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, manufactures reinforced plastics composites watercraft, have emission units where resins and gel coats that contain styrene are applied and cured using the open molding process, and have actual emissions of styrene of greater than 3 tons per year, it is subject to this rule.

However, pursuant to 326 IAC 20-25-3(e), a source that was issued a permit pursuant to 326 IAC 2 on or after June 28, 1998, but prior to the effective date of this rule, and that obtained a revised best available control technology (BACT) determination in the permit for emission units, is not subject to this section until the permit is renewed, or the emission unit undergoes a modification that increases the potential to emit styrene. Although the source was issued a Title V operating permit on June 3, 1999 which contained a BACT determination for the existing fiberglass layup operations (ID Nos. P2-3 and P3-2), it was a BACT determination that was carried over from a previous construction permit issued to the source. The BACT determination was not revised, therefore, the existing fiberglass layup operations are subject to this rule and must comply with the applicable requirements of the rule no later than January 1, 2002.

Pursuant to 326 IAC 20-25-3(f), a new or reconstructed emission unit subject to 326 IAC 2-4.1-1 is not subject to the requirements of this section. Therefore, the new fiberglass layup operation (ID No. P3X-2) is not subject to this rule since it is subject to the presumptive MACT requirements pursuant to 326 IAC 2-4.1-1.

Pursuant to 326 IAC 20-25-3(a), except as provided in 326 IAC 20-25-3 (e), (f), and (h), the Permittee shall comply with the provisions of 326 IAC 20-25-3 on or before January 1, 2002. The total HAP monomer content of the following materials used in the two (2) fiberglass layup operations (ID P2-3 and P3-2) shall be limited depending on the application method and products produced as specified below. Since this source manufactures reinforced plastic composite watercraft, the following limits shall apply to the two (2) fiberglass layup operations (ID P2-3 and P3-2):

TABLE II Watercraft Products	HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
Gel Coat Application	
Production-Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

*Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).

Pursuant to 326 IAC 20-25-3(b), except as provided in 326 IAC 20-25-3(f), the following categories of materials in 326 IAC 20-25-3(a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Pursuant to 326 IAC 20-25-3(c), unless specified in 326 IAC 20-25-3(b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure.
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

Pursuant to 326 IAC 20-25-3(d), cleaning operations for resin and gel coat application equipment are as follows:

- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
- (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of 326 IAC 20-25-3(d).

Pursuant to 326 IAC 20-25-3(g), the Permittee may comply with this section using monthly emission averaging within each resin or gel coat application category listed in 326 IAC 20-25-3(a) without prior approval by the commissioner.

Pursuant to 326 IAC 20-25-3(h), upon written application by the source, the commissioner may approve the following:

- (1) Enforceable alternative emission reduction techniques that are at least equally protective of the environment as the emission standards in 326 IAC 20-25-3(a) through (d).
- (2) Use of monthly emissions averaging for any or all material or application categories listed in 326 IAC 20-25-3(a) if the following conditions are met:
 - (A) The source shows that emissions did not exceed the emissions that would have occurred if each emission unit had met the requirements of 326 IAC 20-25-3(a) through (c).
 - (B) The source uses any one (1) or a combination of the following emission reduction techniques:
 - (i) Resins or gel coats with HAP monomer contents lower than specified in 326 IAC 20-25-3(a).
 - (ii) Vapor suppressed resins.
 - (iii) Vacuum bagging or other similar technique. This item does not include resin transfer molding or compression molding.
 - (iv) Air pollution control equipment where the emissions are estimated based on parametric measurements or stack monitoring.
 - (v) Controlled spray used in combination with automated actuators or robots.
 - (vi) Controlled spray that includes the following:
 - (AA) Mold flanges.

- (BB) Spray technique.
 - (CC) Spray gun pressure.
 - (DD) Means of verifying continuous use of the controlled spray technique, such as mass balance of materials and products (surface area and thickness of product) as approved by the commissioner prior to implementation.
- (vii) Emission reduction techniques approved under 326 IAC 20-25-3(h)(1).

Sources using averaging shall not use spray equipment that produces higher emissions than the equipment specified in 326 IAC 20-25-3(c)(2) through (c)(5).

Pursuant to 326 IAC 20-25-3(i), to determine emission estimates, the following references or methods shall be used:

- (1) "Unified Emission Factors for Open Molding of Composites", April 1999*, except use of controlled spray emission factors must be approved by the commissioner.
- (2) "Compilation of Emission Factors", Volume 1, Fifth Edition, and supplements, January 1995*, except for hand layup and spray layup operations emission factors.
- (3) Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.

Pursuant to 326 IAC 20-25-4, Work Practice Standards, on or before March 1, 2001, the Permittee shall operate in accordance with the following work practice standards:

- (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (2) Except for mixing containers as described in 326 IAC 20-25-4(7), HAP containing materials shall be kept in a closed container when not in use.
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (4) Solvent collection containers shall be kept closed when not in use.
- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

Since this source will not be using air pollution control equipment to comply with this rule, the testing requirements pursuant to 326 IAC 20-25-5 do not apply.

New conditions have been added to section D.1 of the Part 70 permit to include the requirements of 326 IAC 20-25. All existing conditions have been re-numbered accordingly to accommodate the new conditions. Section D.1 is further revised to read as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) one (1) fiberglass layup operation (ID No. P2-3), constructed in 1993, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4);
- (2) one (1) fiberglass layup operation (ID No. P3-2), constructed in 1989, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (3) one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, with dry filters for particulate matter overspray control, and exhausting through seven (7) stacks (ID Nos. S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6 and S3/3X-7);
- (4) one (1) upholstery glue application area (ID No. P1-1), constructed in 1993, located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (5) one (1) assembly glue application area (ID No. P2-1), constructed in 1993, located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;
- (6) one (1) assembly glue application area (ID No. P3-1), constructed in 1989, located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour;
- (7) one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour; and
- (8) one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Total VOC usage in each of the assembly glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2) shall be limited to less than 25.0 tons per 12 consecutive month period, rolled on a monthly basis. This limit is based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used in the assembly glue application area and the flotation foam blowing operation. Compliance with this limit makes 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable.
- (b) Pursuant to CP-085-2400-00031, issued January 29, 1993, the Best Available Control Technology (BACT) for the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) is to comply with the following work practice: solvent used to clean up chopper guns and other tools shall be discharged into containers, and these containers shall be kept covered at all times other than when solvent is discharged into them.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Compliance with 326 IAC 2-4.1-1 (MACT) has been determined to be sufficient as BACT. Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the VOC emissions from the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be limited to less than 100 tons per 12 consecutive month period.

D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or >37% gel coat) - (Emissions from 35% resin or 37% gel coat) ≤ (Emissions from 35% resin or 37% gel coat) - (Emissions from <35% resin, <37% gel coat, and or other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.4 Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25-3]

- (a) Pursuant to 326 IAC 20-25-3(a), except as provided in 326 IAC 20-25-3 (e), (f), and (h), the Permittee shall comply with the provisions of 326 IAC 20-25-3 on or before January 1, 2002. The total HAP monomer content of the following materials used in the two (2) fiberglass layup operations (ID P2-3 and P3-2) shall be limited depending on the application method and products produced as specified below. Since this source manufactures reinforced plastic composite watercraft, the following limits shall apply to the two (2) fiberglass layup operations (ID P2-3 and P3-2):

TABLE II Watercraft Products		HAP Monomer Content, Weight Percent
Resin, Manual, or Mechanical Application		
Production-Specialty Products		48*
Production-Noncorrosion Resistant Unfilled		35*
Production-Noncorrosion Resistant Filled (\$35% by weight)		38
Shrinkage Controlled		52
Tooling		43*
Gel Coat Application		
Production-Pigmented and Base Coat Gel Coat		34
Clear Production and Tooling		48

*Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (b).

- (b) Pursuant to 326 IAC 20-25-3(b), except as provided in 326 IAC 20-25-3(f), the following categories of materials in 326 IAC 20-25-3(a) shall be applied using mechanical nonatomized application technology or manual application:
- (1) Production noncorrosion resistant, unfilled resins from all sources.
 - (2) Production, specialty product resins from all sources.
 - (3) Tooling resins used in the manufacture of watercraft.
 - (4) Production resin used for Class I flame and smoke products.
- (c) Pursuant to 326 IAC 20-25-3(c), unless specified in 326 IAC 20-25-3(b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure.
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) Pursuant to 326 IAC 20-25-3(d), cleaning operations for resin and gel coat application equipment are as follows:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flowcoaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

- (2) **“Compilation of Emission Factors”, Volume 1, Fifth Edition, and supplements, January 1995*, except for hand layup and spray layup operations emission factors.**
- (3) **Site-specific values or other means of quantification provided the site-specific values and the emission factors are acceptable to the commissioner and the U.S. EPA.**

D.1.5 Work Practice Standards [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, on or before March 1, 2001, the Permittee shall operate the two (2) fiberglass layup operations (ID Nos. P2-3 and P3-2) in accordance with the following work practice standards:

- (a) **Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.**
- (b) **Except for mixing containers as described in 326 IAC 20-25-4(7), HAP containing materials shall be kept in a closed container when not in use.**
- (c) **Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.**
- (d) **Solvent collection containers shall be kept closed when not in use.**
- (e) **Clean-up rags with solvent shall be stored in closed containers.**
- (f) **Closed containers shall be used for the storage of the following:**
 - (1) **All production and tooling resins that contain HAPs.**
 - (2) **All production and tooling gel coats that contain HAPs.**
 - (3) **Waste resins and gel coats that contain HAPs.**
 - (4) **Cleaning materials, including waste cleaning materials.**
 - (5) **Other materials that contain HAPs.**
- (g) **All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.**

D.1.46 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Use of resins, gel coats and clean-up solvents, and other material containing volatile organic compounds (VOC), shall be limited such that the potential to emit (PTE) VOC shall be less than 247.0 tons per 365 consecutive day period, rolled on a daily basis. Compliance with this limit shall be determined based upon the following criteria:

- (a) **Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.**
- (b) **Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAQ: “CFA Emission Models for the Reinforced Plastics Industries,” Composites Fabricators Association, February 28, 1998, or its update. These models are now referred to as the “Unified Emission Factors for Open Molding of Composites” (“CFA Factors”, April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.**
- (c) **VOC emissions from each of the other operations shall be based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used.**

This limitation, in conjunction with the potential to emit VOCs of 3.0 tons per year from insignificant activities, will prevent the VOC emissions from being greater than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.57 Stack Height

Pursuant to CP-085-2400-00031, issued January 29, 1993, the following shall apply:

- (a) The four (4) stacks exhausting from Plant 2 (ID Nos. S2-1, S2-2, S2-3, and S2-4) shall have a diameter of 2 feet and a minimum stack height of 25 feet above ground level and shall be located on the west side of Plant 2. All exhaust from the fiberglass layup operation (ID No. P2-3) shall be exhausted through these four (4) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.
- (b) The two (2) stacks exhausting from Plant 3 (ID Nos. S3/3X-1 and S3/3X-2) shall have a diameter of 2 feet and a minimum stack height of 39 feet above ground level and shall be located on the west side of Plant 3. All exhaust from the fiberglass layup operation (ID No. P3-2) shall be exhausted through these two (2) stacks. Each stack shall be equipped with a fan rated at a minimum of 3,535 acfm. These stacks and fans are specified to maintain styrene concentrations at acceptable ambient concentrations.

D.1.68 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM overspray from the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2), the upholstery glue application area (ID No. P1-1), and the three (3) assembly glue application areas (ID Nos. P2-1, P3-1, and P3X-1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.79 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.810 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1, D.1.2, and D.1.46 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.911 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.46 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.102 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)

Compliance with the monomer content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to Condition D.1.3(a) and D.1.3(b).

D.1.13 Hazardous Air Pollutants (HAPs) [326 IAC 20-25-5]

Pursuant to 326 IAC 20-25-5(c), compliance with the HAP monomer content and usage limitations specified in condition D.1.4 shall be determined using one (1) of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
 - (3) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with condition D.1.4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.144 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2) are in operation.

D.1.125 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass layup booth stacks (S2-1, S2-2, S2-3, S2-4, S3/3X-1, S3/3X-2, S3/3X-3, S3/3X-4, S3/3X-5, S3/3X-6, and S3/3X-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.136 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.46, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.46.
 - (1) For Plants 2, 3, and the Plant 3 expansion the following records shall be maintained:
 - (i) A log of the number of boats produced in Plants 2 and 3 and the number of boat feet produced in the Plant 3 expansion on a daily basis;
 - (ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (iii) The cleanup solvent usage for each month;
 - (iv) The total VOC usage for each month; and
 - (v) The weight of VOCs emitted for each compliance period.
 - (2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), the amount and VOC content of each material and solvent used shall be recorded on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established in Conditions D.1.2 and D.1.3.
 - (1) The usage by weight and monomer content of resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and
 - (5) The calculated total VOC emitted from resin and gel coat usage for each month and for the compliance period.
- (c) To document compliance with Conditions D.1.144 and D.1.125, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Record Keeping Requirements [326 IAC 20-25-6]

- (a) Pursuant to 326 IAC 20-25-6(a), on and after January 1, 2002, the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 326 IAC 20-25. Examples of such records are as follows:
 - (1) Purchase orders.
 - (2) Invoices.
 - (3) Material safety data sheets (MSDS).
 - (4) Manufacturer's certified product data sheets.
 - (5) Calculations.
 - (6) Other records to confirm compliance.
- (b) Pursuant to 326 IAC 20-25-6(b), the Permittee shall maintain records of all information, including all reports and notifications required by 326 IAC 20-25. Such records shall be recorded in a form suitable and readily available for inspection and review. Except as provided in 326 IAC 20-25-8(d), the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

D.1.148 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.46 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.19 Reporting Requirements [326 IAC 20-25-7]

- (a) Pursuant to 326 IAC 20-25-7(a), on or before June 1, 2001, the owner or operator of a source subject to this rule shall submit an initial notification report to the commissioner. The notification report shall include all of the following:
- (1) Name and address of the owner or operator.
 - (2) Address of the physical location of the source.
 - (3) Statement verifying that the source is subject to the rule signed by a responsible official as set forth in 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to this rule shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:
- (1) Name and address of the owner or operator.
 - (2) Address of the physical location.
 - (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.
- (c) Pursuant to 326 IAC 20-25-7(c), sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) shall submit a quarterly summary report and supporting calculations.

D.1.20 Operator Training [326 IAC 20-25-8]

- (a) Pursuant to 326 IAC 20-25-8(a), the Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) according to the following schedule:
- (1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.
 - (3) To ensure training goals listed in 326 IAC 20-25-8(b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to this rule are exempt from paragraph (1) above if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (b) Pursuant to 326 IAC 20-25-8(b), the lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
- (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (c) Pursuant to 326 IAC 20-25-8(c), the Permittee shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.**
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.**
- (d) Pursuant to 326 IAC 20-25-8(d), records of prior training programs and former personnel are not required to be maintained.**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Rinker Boat Company, Inc.
Source Location:	300 West Chicago Street, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3732
Operation Permit No.:	T085-7516-00031
Operation Permit Issuance Date:	June 3, 1999
Source Modification No.:	085-13683-00031
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Rinker Boat Company, Inc. relating to the operation of a stationary fiberglass boat building and repairing operation.

History

On December 29, 2000, Rinker Boat Company, Inc. submitted an application to the OAQ requesting to expand the production capability of the source by adding an additional lamination operation including a new gel coat booth and an additional adhesive application operation which will be housed in a new manufacturing area. Rinker Boat Company, Inc. was issued a Part 70 permit on June 3, 1999. The new equipment to be added is as follows:

- (a) one (1) fiberglass layup operation (ID No. P3X-2), located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, exhausting through seven (7) stacks (ID Nos. V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9); and
- (b) one (1) assembly glue application area (ID No. P3X-1), located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour.

The source is also adding the following insignificant activities:

- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building;
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including space heaters for comfort heating including:

- (1) one (1) natural gas-fired space heater with a maximum heat input capacity of 4.4 million (MM) British thermal units (Btu) per hour located in the Plant 3 expansion; and
 - (2) one (1) natural gas-fired space heater with a maximum heat input capacity of 5.25 million (MM) British thermal units (Btu) per hour located in the Plant 3 expansion.
- (c) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius), including the use of various mold release waxes as well as polishing and sealing waxes used in the finishing process.

Source Definition

This stationary fiberglass boat building and repairing operation consists of four (4) plants:

- (1) Plants 1 through 4 are all located at 300 West Chicago Street, Syracuse, Indiana 46567.

Since the four (4) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Existing Approvals

The source was issued a Part 70 Operating Permit (T085-7516-00031) on June 3, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 085-11115, issued on December 6, 1999.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
V4-3*	P3-2 and P3X-2	30	3	4265	ambient
V4-4*	P3-2 and P3X-2	30	3	4265	ambient
V4-5	P3-2 and P3X-2	30	3	4265	ambient
V4-6	P3-2 and P3X-2	30	3	4265	ambient
V4-7**	P3-2 and P3X-2	30	3	4265	ambient
V4-8**	P3-2 and P3X-2	30	3	4265	ambient
V4-9	P3-2 and P3X-2	30	3	4265	ambient

* These vents are existing roof vents that are being modified to capture emissions from P3-2 (existing) and P3X-2 (expansion).

** These vents were wall vents that will be modified into roof vents that will exhaust emissions from the existing gel coat booths in Plant 3 and the new Plant 3X lamination operation emissions.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 29, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	55.92
PM-10	45.13
SO ₂	0.03
VOC	145.49
CO	3.55
NO _x	4.23

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	greater than 10
Methyl Methacrylate	less than 10
Toluene	less than 10
n-Hexane	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM, PM-10, and VOC is greater than 25 tons per year. Therefore, the Part 70 permit is being modified through a Part 70 Significant Source Modification.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the Part 70 permit is being modified through a Part 70 Significant Source Modification.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Fiberglass Layup, Adhesive Application, and Foam Blowing ⁽¹⁾	16.4	16.4	0.0	246.0	0.0	0.0	163.4
Woodworking ⁽²⁾	8.2	8.2	0.0	0.0	0.0	0.0	0.0
Insignificant Activities ⁽³⁾	15.66	4.87	0.07	3.0	5.08	11.51	0.0
Total Emissions	40.26	29.47	0.07	249.0	5.08	11.51	163.4
PSD Major Source Threshold	250	250	250	250	250	250	n/a

- (1) This includes the existing units identified as P2-3, P3-2, P1-1, P2-1, P3-1, and P2-2 and the new units identified as P3X-2 and P3X-1. Limited PM, PM10, VOC, and HAP emissions include a source-wide (excluding insignificant activities and woodworking) material usage limitation of 19.94% so that VOC emissions are limited to less than 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD). Note that VOC and HAP emissions from the new fiberglass layup operation, P3X-2, are also limited to less than 100 tons per year pursuant to 326 IAC 2-4.1-1 and 326 IAC 8-1-6.
- (2) This is the existing woodworking operation identified as P1-2.
- (3) The insignificant activities includes the existing emission units, the new Trim-off operation, and the new heaters.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4). This Part 70 Significant Source Modification will give the source approval to construct and operate the new emission units.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Existing Source	20.4	20.4	0.0	249.0	1.5	7.3
Proposed Modification	32.40	32.63	0.03	117.49	3.55	4.23
PSD Significant Modification Threshold Level	250	250	250	250	250	250

- (a) This modification to an existing minor stationary source is not major because the emission increase from the modification is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

- (b) The existing source emissions were based on the Part 70 permit (T085-7516-00031), issued June 3, 1999 to this source. The existing source had a source-wide VOC emission limit of 249.0 tons per year in the Part 70 permit to avoid the requirements of 326 IAC 2-2 and 40 CFR 52.21. The source will now include the new equipment in the source-wide VOC emission limit to remain a minor stationary source.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD) because the source will limit VOC emissions from the fiberglass layup operations (ID Nos. P2-3, P3-2, and P3X-2), the glue application areas (ID Nos. P1-1, P2-1, P3-1, and P3X-1), and the foam blowing operation (ID No. P2-2) to 246.0 tons per 365 consecutive day period, rolled on a daily basis so that source wide VOC emissions are limited to less than 250.0 tons per 365 consecutive day period. Due to the addition of the additional space heaters, this limit has been adjusted from 246.2 tons per year to 246.0 tons per year. Also, PM and PM-10 emissions from the existing fiberglass layup operations (ID Nos. P2-3 and P3-2) will be controlled using dry filters so that source wide PM and PM-10 emissions are less than 250.0 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the new fiberglass layup operation (ID No. P3X-2) will emit greater than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 will apply. Pursuant to the presumptive Maximum Achievable Control Technology (MACT) determination under 326 IAC 2-4.1-1, operating conditions for the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) emissions from the Trim-off operation shall be limited to 4.86 pounds per hour based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$
$$P = 1.29 \text{ tons per hour}$$

Potential PM emissions from the Trim-off operation are less than the allowable emissions pursuant to this rule, therefore, the Trim-off operation is in compliance with 326 IAC 6-3-2.

- (b) The particulate matter (PM) from the new gel coat booth when using the HVLP spray application system, and the assembly glue application area (ID P3X-1) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

Pursuant to 326 IAC 8-1-6, the new fiberglass layup operation (ID No. P3X-2) is subject to the requirements of 326 IAC 8-1-6 because it was constructed after January 1, 1980, and has potential VOC emissions of 25 tons per year or more. 326 IAC 8-1-6 requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for the new fiberglass layup operation (ID No. P3X-2) shall be satisfied by complying with the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control). The only HAPs emitted from the new fiberglass layup operation (ID No. P3X-2) are styrene and methyl methacrylate, which are also the only VOC emitted from this facility. The applicability of 326 IAC 2-4.1-1 (New Source Toxics Control), which limits HAPs (styrene and methyl methacrylate) emissions to less than 100 tons per 12 consecutive month period from the new fiberglass layup operation (ID No. P3X-2), also, in effect, limits the VOC (styrene and methyl methacrylate) emissions from the new fiberglass layup operation (ID No. P3X-2), to less than 100 tons per 12 consecutive month period. Therefore, pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the VOC emissions from the new fiberglass layup operation (ID No. P3X-2) shall be limited to less than 100 tons per 12 consecutive month period.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T085-7516-00031). It should also be noted that as of January 1, 2001, the Office of Air Management is now being referred to as the Office of Air Quality. Therefore, all references to the Office of Air Management have been revised to refer to the Office of Air Quality.

1. The words Enhanced New Source Review and the rule cite for ENSR have been removed from the title page of the Part 70 Operating permit. This rule has been repealed.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. Condition A.1 (General Information) has been revised to include the rule cite for the definition of a major source in 326 IAC 2-7. Also, "County status" has been changed to "Source Location Status". This should help clarify when only portions of a county are non-attainment.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary fiberglass boat building and repairing operation.

Responsible Official: Mr. Kim Slocum
Source Address: 300 West Chicago Street, Syracuse, Indiana 46567
Mailing Address: 300 West Chicago Street, Syracuse, Indiana 46567
SIC Code: 3732
County Location: Kosciusko
~~County Status~~ **Source Location Status:**
Source Status: Attainment for all criteria pollutants
Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

3. The dates of construction have been added to the facility descriptions in section A.2 (Emission Units and Pollution Control Equipment Summary) and section D.1. Also, the new equipment has

been added to sections A.2 and D.1. Section A.2 has been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) fiberglass layup operation (ID No. P2-3), **constructed in 1993**, located in Plant 2, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.5 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2);
 - (2) one (1) fiberglass layup operation (ID No. P3-2), **constructed in 1989**, located in Plant 3, utilizing a spray layup gel coat application system and a resin spray layup or flow coating application system, producing a maximum of 1.0 fiberglass boats per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S3-1 and S3-2);
 - (3) **one (1) fiberglass layup operation (ID No. P3X-2), constructed in 2001, located in the Plant 3 expansion, utilizing a flow coating and/or high volume-low pressure (HVLP) spray layup gel coat application system and a resin flow coating application system, producing a maximum of 8.125 fiberglass boat feet per hour, exhausting through seven (7) stacks (ID Nos. V4-3, V4-4, V4-5, V4-6, V4-7, V4-8, and V4-9);**
 - ~~(3)~~(4) one (1) upholstery glue application area (ID No. P1-1), **constructed in 1993**, located in Plant 1, using a high volume - low pressure (HVLP) spray application system, coating a maximum of 1.0 set of boat parts per hour;
 - ~~(4)~~(5) one (1) assembly glue application area (ID No. P2-1), **constructed in 1993**, located in Plant 2, using an HVLP spray application system, coating a maximum of 1.5 sets of boat parts per hour;
 - ~~(5)~~(6) one (1) assembly glue application area (ID No. P3-1), **constructed in 1989**, located in Plant 3, using an HVLP spray application system, coating a maximum of 1.0 set of boat parts per hour;
 - (7) **one (1) assembly glue application area (ID No. P3X-1), constructed in 2001, located in the Plant 3 expansion, using an HVLP spray application system, coating a maximum of 8.125 boat feet per hour;**
 - ~~(6)~~(8) one (1) foam blowing operation (ID No. P2-2), **constructed in 1993**, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, with dry filters for particulate matter overspray control, and exhausting through two (2) stacks (ID Nos. S2-1 and S2-2); and
 - ~~(7)~~(9) one (1) woodworking operation (ID No. P1-2), **constructed in 1993**, located in Plant 1, consisting of two (2) routers, three (3) table saws, three (3) chop saws, one (1) panel saw, and one (1) belt sander, processing a maximum of 890 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).
4. Section A.3 (Insignificant Activities) has been revised to include the new Trim-off operation which is subject to the requirements of 326 IAC 6-3-2 (Process Operations). The section now reads as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.~~

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) **Other categories with emissions below significant thresholds:**

- (a) **one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]**

5. A new condition D.1.2 has been added to the Part 70 permit to include the BACT requirements for the new fiberglass layup operation pursuant to 326 IAC 8-1-6. The new condition reads as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Compliance with 326 IAC 2-4.1-1 (MACT) has been determined to be sufficient as BACT. Pursuant to 326 IAC 8-1-6 (Best Available Control Technology), the VOC emissions from the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be limited to less than 100 tons per 12 consecutive month period.

6. A new condition D.1.3 has been added to the Part 70 permit to include the presumptive MACT requirements for the new fiberglass layup operation pursuant to 326 IAC 2-4.1-1. All subsequent conditions in section D.1 have been re-numbered accordingly. The new condition D.1.3 reads as follows:

D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new fiberglass layup operation (ID No. P3X-2), including the new gel coat booth, shall be the following:

- (a) **Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per year, per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:**
 - (1) **Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.**
 - (2) **Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.**
- (b) **Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for**

resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAQ, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and or other emission reduction techniques}).$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAQ, shall be used to apply 100% of all neat resins used within 1 year of commencement of operation.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in paragraph (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work

stations shall be closed containers having soft gasketed spring-loaded closures.

- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.**
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.**
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.**

7. Condition D.1.2 (PSD Minor Limit) (now D.1.4) has been revised such that the VOC emission limit is changed from 246.2 tons per 365 consecutive day period to 246.0 tons per 365 consecutive day period to account for the increase in insignificant activity VOC emissions of 0.2 tons per year due to the addition of the two (2) space heaters.

D.1.24 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Use of resins, gel coats and clean-up solvents, and other material containing volatile organic compounds (VOC), shall be limited such that the potential to emit (PTE) VOC shall be less than ~~246.2~~ **246.0** tons per 365 consecutive day period, rolled on a daily basis. Compliance with this limit shall be determined based upon the following criteria:

- (a) Daily usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, **OAMQ**.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, **OAMQ**: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (c) VOC emissions from each of the other operations shall be based on an emission factor of 2000 pounds of VOC emitted per ton of VOC used.

This limitation, in conjunction with the potential to emit VOCs of ~~2-8~~ **3.0** tons per year from insignificant activities, will prevent the VOC emissions from being greater than 249 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

8. Condition D.1.4 (Particulate Matter (PM)) (now D.1.6) has been revised to include the new fiberglass layup operation and the new glue application area as follows:

D.1.46 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM overspray from the ~~two (2)~~ **three (3)** fiberglass layup operations (ID Nos. P2-3, ~~and~~ P3-2, **and P3X-2**), the upholstery glue application area (ID No. P1-1), and the ~~two (2)~~ **three (3)** assembly glue application areas (ID Nos. P2-1, ~~and~~ P3-1, **and P3X-1**) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

9. Condition D.1.6 (Testing Requirements), now D.1.8, has been revised to include reference to the new condition D.1.2 which contains the limit on VOC emissions from the new fiberglass layup operation pursuant to 326 IAC 8-1-6. The condition now reads as follows:

D.1.68 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1, ~~and~~ D.1.2, **and D.1.4** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

10. Condition D.1.7 (Volatile Organic Compounds (VOC)) (now D.1.9) has been revised to include reference to condition D.1.4 which also includes a VOC usage limitation. The condition now reads as follows:

D.1.79 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 **and D.1.4** shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, ~~OAMQ~~ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

11. A new condition D.1.10 (Volatile Organic Compounds (VOC)) has been added to reference the compliance determination method for the VOC and HAP limitations in conditions D.1.2 and D.1.3. The new condition reads as follows:

D.1.10 Volatile Organic Compounds (VOC) and Volatile Organic Hazardous Air Pollutants (HAP)

Compliance with the monomer content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to Condition D.1.3(a) and D.1.3(b).

12. Condition D.1.10 (Record Keeping Requirements) (now D.1.13) has been revised to include additional record keeping requirements to document compliance with the BACT and MACT requirements in the new conditions D.1.2 and D.1.3. The condition is revised to read as follows:

D.1.103 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.~~24~~, the Permittee shall maintain records in accordance with (1) through (2) below. Records shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.~~24~~.

(1) For Plants 2 and 3 the following records shall be maintained:

(i) A log of the number of boats produced in Plants 2 and 3 on a daily basis;

- (ii) The amount and VOC content of each material and solvent used per month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (iii) The cleanup solvent usage for each month;
 - (iv) The total VOC usage for each month; and
 - (v) The weight of VOCs emitted for each compliance period.
- (2) For the glue application area (ID No. P2-1) and the flotation foam blowing operation (ID No. P2-2), the amount and VOC content of each material and solvent used shall be recorded on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compounds (VOC) and volatile organic HAP emission limits established in Conditions D.1.2 and D.1.3.**
- (1) The usage by weight and monomer content of resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
 - (2) A log of the dates of use;**
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;**
 - (4) The calculated total volatile organic HAP emitted from resin and gel coat usage for each month and for the compliance period; and**
 - (5) The calculated total VOC emitted from resin and gel coat usage for each month and for the compliance period.**
- ~~(b)~~(c) To document compliance with Conditions D.1.811 and D.1.912, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(c)~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
13. Condition D.1.11 (Reporting Requirements), (now D.1.14), has been revised to require quarterly reports for the BACT and MACT limitations in the new conditions D.1.2 and D.1.3. The revised condition reads as follows:
- D.1.14 Reporting Requirements
- A quarterly summary of the information to document compliance with Conditions D.1.1, ~~and~~ D.1.2, **D.1.3, and D.1.4** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
14. A quarterly report form has been added to the Part 70 permit for the VOC and volatile organic

HAP emission limitations included in the BACT and MACT requirements, respectively.

15. A new section D.3 has been added to the Part 70 permit to include the Trim-off operation, which is an insignificant activity subject to the requirements of 326 IAC 6-3-2. The new section D.3 reads as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) Other categories with emissions below significant thresholds:
- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Trim-off operation shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Conclusion

This source modification shall be subject to the conditions of the attached Part 70 Permit No. 085-7516-00031.

Appendix A: Emission Calculations

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Plt ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000

Total Potential To Emit (tons/year)

Emissions Generating Activity

Pollutant	Fiberglass Layup	Adhesive Application	Trim-Off Operation	Space Heaters	TOTAL
PM	39.98	1.15	14.71	0.08	55.92
PM10	39.98	1.15	3.68	0.32	45.13
SO2	0.00	0.00	0.00	0.03	0.03
NOx	0.00	0.00	0.00	4.23	4.23
VOC	127.00	18.26	0.00	0.23	145.49
CO	0.00	0.00	0.00	3.55	3.55
total HAPs	127.00	3.09	0.00	negl.	130.09
worst case single HAP	120.70	2.23	0.00	negl.	120.70

Total emissions based on rated capacities at 8,760 hours/year.

Controlled Emissions (tons/year)

Emissions Generating Activity

Pollutant	Fiberglass Layup	Adhesive Application	Trim-Off Operation	Space Heaters	TOTAL
PM	3.12	1.15	0.01	0.08	4.36
PM10	3.12	1.15	3.7E-03	0.32	4.59
SO2	0.00	0.00	0.00	0.03	0.03
NOx	0.00	0.00	0.00	4.23	4.23
VOC	99.00	18.26	0.00	0.23	117.49
CO	0.00	0.00	0.00	3.55	3.55
total HAPs	99.00	3.09	0.00	negl.	102.09
worst case single HAP	94.10	2.23	0.00	negl.	94.10

Total emissions based on rated capacities at 8,760 hours/year.

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Fiberglass Processes

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Pit ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000

State Potential Emissions (uncontrolled):												
Material (as applied)	Density (Lb/Gal)	Weight % Styrene Monomer or VOC	Emission Factor lb emitted per ton resin/gel-coat processed	Usage Rate (lb/part)	Maximum (unit/hour)	Volume % Non-Vol (solids)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Manual Resin Application - P3X-2												
Ashland AME 1000 Resin	9.00	33.45%	86.30	0.54	8.125	66.55%	0.19	4.57	0.83	0.00	4.52	100.00%
Mechanical Non-Atomized Resin Application - P3X-2												
Ashland AME 1000 Resin	9.00	33.45%	72.65	53.72	8.125	66.55%	15.85	380.50	69.44	0.00	4.52	100.00%
Evercoat Spraycore Resin	5.80	37.69%	83.93	2.03	8.125	78.00%	0.69	16.61	3.03	0.00	2.80	100.00%
Mechanical Non-Atomized Gel Coat Application - P3X-2 with Styrene Monomer												
Ferro Sand Ultra Gel Coat	10.90	32.20%	286.58	4.83	8.125	67.80%	5.62	134.96	24.63	0.00	5.18	100.00%
Ferro Green Ultrashield	9.40	33.60%	302.40	0.26	8.125	66.40%	0.32	7.64	1.39	0.00	4.76	100.00%
Lilly Interior Sand White	11.36	33.98%	315.00	1.27	8.125	66.02%	1.63	39.13	7.14	0.00	5.85	100.00%
Mechanical Non-Atomized Gel Coat Application - P3X-2 with Methyl Methacrylate Monomer												
Ferro Sand Ultra Gel Coat	10.90	3.00%	45.00	4.83	8.125	97.00%	0.88	21.19	3.87	0.00	0.34	100.00%
Ferro Green Ultrashield	9.40	8.00%	120.00	0.26	8.125	92.00%	0.13	3.03	0.55	0.00	0.82	100.00%
Lilly Interior Sand White	11.36	0.00%	0.00	1.27	8.125	100.00%	0.00	0.00	0.00	0.00	0.00	100.00%
Mechanical Atomized Gel Coat Application - P3X-2 with Styrene Monomer												
Ferro Sand Ultra Gel Coat	10.90	32.20%	286.58	2.07	8.125	67.80%	2.41	57.84	10.56	12.49	6.90	75.00%
Ferro Green Ultrashield	9.40	33.60%	302.40	0.11	8.125	66.40%	0.14	3.27	0.60	0.66	6.34	75.00%
Lilly Interior Sand White	11.36	33.98%	315.00	0.55	8.125	66.02%	0.70	16.77	3.06	3.21	7.80	75.00%
Mechanical Atomized Gel Coat Application - P3X-2 with Methyl Methacrylate Monomer												
Ferro Sand Ultra Gel Coat	10.90	3.00%	45.00	2.07	8.125	97.00%	0.38	9.08	1.66	17.86	0.45	75.00%
Ferro Green Ultrashield	9.40	8.00%	120.00	0.11	8.125	92.00%	0.05	1.30	0.24	0.91	1.09	75.00%
Lilly Interior Sand White	11.36	0.00%	0.00	0.55	8.125	100.00%	0.00	0.00	0.00	4.86	0.00	75.00%
Total State Potential Emissions:							29.00	695.88	127.00	39.98		
Federal Potential Emissions (controlled):												
				Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
					VOC	PM						
Total Federal Potential Emissions:				77.95%	0.00%	90.00%	22.60	542.44	99.00	3.12		

Notes:

All VOC emissions are HAP emissions.
 Potential Styrene emissions = 120.7 tons/yr and potential methyl methacrylate emissions = 6.31 tons/yr.
 Limited Styrene emissions = 94.1 tons/yr and limited methyl methacrylate emissions = 4.92 tons/yr.
 Volatile organic HAP emissions from resins and gel coats must be limited to less than 100 tons/yr to comply with the presumptive MACT requirements pursuant to 326 IAC 2-4.1-1

Methodology:

Potential VOC Pounds per Hour = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * Emission Factor
 Potential VOC Pounds per Day = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 1 ton/2000 lbs * (24 hr/day) * Emission Factor
 Potential VOC Tons per Year = Density of coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (1 ton/2000 lbs) * Emission Factor * (8760 hrs/yr) * 1 ton/2000 lbs
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
 Controlled VOC emission rate = uncontrolled emission rate * Material usage limitation
 Controlled PM emission rate = uncontrolled emission rate * (1 - control efficiency) * Material usage limitation
 Emission Factors are based on the Unified Emission Factors for Open Molding of Composites, developed by the CFA for the Reinforced Plastics Industries, April, 1999.

**Appendix A: Emission Calculations
VOC and Particulate
From Adhesive Application**

Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Pit ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
2725T Adhesive	P3X-1	6.80	73.53%	0.00%	73.53%	0.00%	13.30%	0.050	8.125	5.0	5.00	2.03	48.65	8.88	0.80	50.13	75.00%	
284 TACC Non flammable	P3X-1	10.88	86.87%	0.00%	86.87%	0.00%	14.30%	0.028	8.125	9.5	9.45	2.14	51.42	9.38	0.35	88.13	75.00%	
Total State Potential Emissions:												4.17	100.07	18.26	1.15			
Federal Potential Emissions (controlled):																		
										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										VOC	PM							
Total Federal Potential Emissions:										0.00%	0.00%	4.17	100.07	18.26	1.15			

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

**Appendix A: Emission Calculations
HAP Emissions - Potential to Emit**

**Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Plt ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000**

Potential To Emit								
Material	Process	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Weight % Toluene	Weight % n-Hexane	Toluene Emissions (tons/yr)	n-Hexane Emissions (tons/yr)
P3X-1 Adhesive Application								
2725T Adhesive	P3X-1	6.80	0.050	8.125	18.50%	7.10%	2.23	0.86
284 TACC Non flammable	P3X-1	10.88	0.028	8.125	0.00%	0.00%	0.00	0.00
							2.23	0.86
								3.09

Methodology:

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb)

**Appendix A: Emission Calculations
HAP Emissions - Potential to Emit**

**Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Plt ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000**

Potential To Emit								
Material	Process	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Weight % Toluene	Weight % n-Hexane	Toluene Emissions (tons/yr)	n-Hexane Emissions (tons/yr)
P3X-1 Adhesive Application								
2725T Adhesive	P3X-1	6.80	0.050	8.125	18.50%	7.10%	2.23	0.86
284 TACC Non flammable	P3X-1	10.88	0.028	8.125	0.00%	0.00%	0.00	0.00
							2.23	0.86
								3.09

Methodology:

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

**Company Name: Rinker Boat Company, Inc.
Address City IN Zip: 300 West Chicago Street, Syracuse, Indiana 46567
Significant Source Modification No.: 085-13683
Pit ID: 085-00031
Reviewer: Trish Earls/EVP
Date: December 29, 2000**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.7	84.5

Heat input capacity includes one (1) heater rated at 4.4 MMBtu/hr and one (1) heater rated at 5.25 MMBtu/hr.

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.32	0.03	4.23	0.23	3.55

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton